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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STONEWELL CORPORATION and  
RICHARD J. GLADSTONE

04 CV 09867 (KMW)

Plaintiffs

-against-

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

CONESTOGA TITLE INSURANCE CO.,  
JERSEYSEARCH TITLE SERVICES, INC. and  
WILLIAM KOLSHORN,

Defendant.

-----X  
*consolidated with*  
-----X

CONESTOGA TITLE INSURANCE CO.,

Plaintiff

- against -

STONEWELL CORPORATION and  
RICHARD J. GLADSTONE,

Defendants.  
-----X

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, RICHARD B. HERMAN, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

E. Elliot Adler, Esquire  
The Adler Law Group  
Emerald Plaza Building  
402 West Broadway, Suite 860  
San Diego, CA 92101  
Tel: 619-531-8700  
Fax: 858-412-4512

E. ELLIOT ADLER, ESQ. is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceedings against E. ELLIOT ADLER, ESQ. in any State or Federal Court.

Dated: New York, New York  
December 2, 2009

Respectfully submitted,  
RICHARD B. HERMAN, P.C.

By: 

Richard B. Herman, Esq.  
SDNY Bar RH-6524  
300 Park Avenue, Suite 1700  
New York, NY 10022  
Tel.: 212-759-6300  
Fax.: 212-759-7373

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STONEWELL CORPORATION and  
RICHARD J. GLADSTONE

04 CV 09867 (KMW)

Plaintiffs

-against-

**AFFIDAVIT IN SUPPORT OF  
MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

CONESTOGA TITLE INSURANCE CO.,  
JERSEYSEARCH TITLE SERVICES, INC. and  
WILLIAM KOLSHORN,

Defendants.

-----X  
*consolidated with*

-----X  
CONESTOGA TITLE INSURANCE CO.,

Plaintiff

- against -

STONEWELL CORPORATION and  
RICHARD J. GLADSTONE,

Defendants.

-----X  
State of New York     )  
                              )     ss:  
County of New York    )

RICHARD B. HERMAN, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Plaintiffs, STONEWELL CORPORATION and RICHARD J. GLADSTONE, in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in Support of Plaintiffs' motion to admit E. Elliot Adler, Esq. as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1984. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known E. Elliot Adler, Esq. for approximately three years.
4. E. Elliot Adler, Esq. is a partner in the Adler Law Group.
5. I have found Mr. Adler to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of E. Elliot Adler, Esq., pro hac vice.
7. I respectfully submit a proposed order granting the admission of E. Elliot Adler, Esq., pro hac vice, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit E. Elliot Adler, Esq., pro hac vice, to represent Defendants in the above-captioned matter, be granted.

Dated: New York, New York  
December 2, 2009

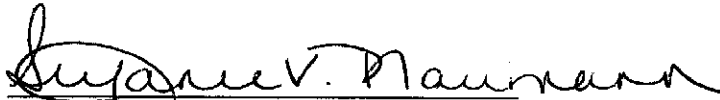
Respectfully submitted,  
RICHARD B. HERMAN, P.C.

By: 

Richard B. Herman, Esq.  
SDNY Bar RH-6524  
300 Park Avenue, Suite 1700  
New York, NY 10022  
Tel.: 212-759-6300  
Fax.: 212-759-7373

Sworn to before me this  
2<sup>nd</sup> day of December, 2009

**STEFANIE V. PLAUMANN**  
Notary Public, State of New York  
No. 02PL6082802  
Qualified in Kings County  
Commission Expires November 4, 2010 <sup>10</sup>

  
NOTARY PUBLIC



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

November 24, 2009

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, ENRIQUE ELLIOT ADLER, #229030 was admitted to the practice of law in this state by the Supreme Court of California on December 9, 2003; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Sima La Fontaine".

Sima La Fontaine  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
STONEWELL CORPORATION and  
RICHARD J. GLADSTONE

04 CV 09867 (KMW)

Plaintiffs

-against-

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

CONESTOGA TITLE INSURANCE CO.,  
JERSEYSEARCH TITLE SERVICES, INC. and  
WILLIAM KOLSHORN,

Defendants.

-----X  
*consolidated with*

-----X  
CONESTOGA TITLE INSURANCE CO.,

Plaintiff

- against -

STONEWELL CORPORATION and  
RICHARD J. GLADSTONE,

Defendants.

-----X  
Upon the motion of RICHARD B. HERMAN, ESQ., attorney for Plaintiffs,  
STONEWELL CORPORATION and RICHARD J. GLADSTONE, and said sponsor attorney's  
affidavit in support:

**IT IS HEREBY ORDERED** that

E. Elliot Adler, Esquire  
The Adler Law Group  
Emerald Plaza Building  
402 West Broadway, Suite 860  
San Diego, CA 92101  
Tel: 619-531-8700  
Fax: 858-412-4512

is admitted to practice pro hac vice as counsel for Plaintiffs, STONEWELL CORPORATION  
and RICHARD J. GLADSTONE, in the above-captioned case in the United States District Court  
for the Southern District of New York. All attorneys appearing before this Court are subject to

the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: New York, New York  
December 2, 2009

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HON. KIMBA M. WOOD  
UNITED STATES DISTRICT JUDGE





via electronic mail on the following persons:

B. Ted Howes, Esquire  
Counsel for Conestoga Title Insurance Co.  
[bhowes@mwe.com](mailto:bhowes@mwe.com)

Eli S. Cohn, Esq.  
Counsel for Third-Party Defendants Matthew Dollinger and  
Dollinger Gonski & Grossman  
[escohn@mmcthk.com](mailto:escohn@mmcthk.com)

Dated: New York, New York  
December 2, 2009

  
STEPHANIE V. PLAUMANN